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 Pro se Plaintiff and
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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DOUGLAS F. CARLSON,)	Civil Action,
MAYA ZUBKOVSKAYA)	File No. 21-02876-LB
Plaintiffs)	
)	
v.)	STIPULATION AND PROPOSED ORDER
)	TO EXTEND DISCOVERY AND OTHER
)	DEADLINES
CITY AND COUNTY OF SAN)	
FRANCISCO et al.)	
Defendants)	

On September 13, 2022, pursuant to stipulation, this court modified the scheduling order for this case. ECF No. 47. Among other deadlines, the order set a deadline of December 20, 2022, for the end of fact discovery.

To date, the parties have conducted but not entirely completed written discovery. The parties have conducted two depositions, have one deposition scheduled, and are working to schedule all remaining depositions. During discovery, the parties have encountered various delays and require additional time to complete discovery due to a number of discovery disputes that the parties have met and conferred about, a need to delay plaintiff Maya Zubkovskaya's deposition to accommodate her ongoing medical treatment and related travel, to accommodate one police officer defendant's leave of absence, and general scheduling challenges. The parties submit that good cause exists for an update of the schedule, maintaining the general spacing of dates following the close of fact

discovery as this court set in its original order. ECF No. 19. Holiday vacation schedules delayed the parties in filing this joint stipulation before the December 20, 2022, close of fact discovery.

Accordingly, the parties stipulate to the following revised schedule:

Case Event	Current Date	New Date
Fact Discovery Cut-Off	December 20, 2022	February 21, 2023
Disclosures of Opening Experts	January 10, 2023	March 14, 2023
Disclosures of Rebuttal Experts	February 14, 2023	April 18, 2023
Expert Discovery cut off	March 14, 2023	May 16, 2023
Last Hearing Date for Dispositive	May 18, 2023	July 20, 2023
Motions or Further CMC		
Final Pretrial Conference	August 3, 2023	October 19, 2023
Trial	August 14, 2023	October 30, 2023 (or the Court's closest available trial date)

Defense counsel has authorized plaintiffs' counsel to file this document and to represent defendants' position as described herein.

Respectfully submitted,

Dated: December 30, 2022

/s/ Douglas F. Carlson
DOUGLAS F. CARLSON
Pro se Plaintiff and
Attorney for Plaintiff Maya Zubkovskaya

IT IS SO ORDERED.

Dated: January 3, 2023



LAUREL BEELER
United States Magistrate Judge